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July 1, 2024

VIA ECF

Hon. Kenneth M Karas
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: Badillo v. Village of Ardsley, et al.

Docket No. 7:24-cv-01688

Dear Judge Karas:

This firm represents Defendants, Village of Ardsley, Anthony Piccolino, Daniel Tarantino, Daniel Watson, and Brian Watson (together as "Defendants"), in the above matter. On June 11, 2024, the Court held a conference with counsel for all parties resulting in a Motion Scheduling Order setting forth a briefing schedule for motions to dismiss the Complaint in this matter. On June 17, 2024, counsel for the parties conferred for the first time to discuss the possibility of achieving the full and final, global settlement of this matter, and settlement negotiations remain ongoing in earnest at this time.

To enable the parties to continue these negotiations, avoid the costs/fees associated with motion practice, as well as judicial resources that would be required to adjudicate the motions, counsel for all parties respectfully request a thirty (30) day extension of all dates set forth in the Motion Scheduling Order entered by the Court on June 11, 2024. (ECF No. 28).

This is Defendants' first request in connection with the Court's June 11, 2024 Motion Scheduling Order. Counsel for all parties respectfully submit that this requested thirty (30) day extension will enable counsel for the parties to fully explore and exhaust settlement negotiations with the objective of achieving global settlement and avoiding further litigation of this matter.

Thank you for your consideration of this request.

Respectfully submitted,

GORDON & REES

/s/ Michael S. Hanan

Michael S. Hanan

cc: John Howley, Esq., counsel for Plaintiff (via ECF)
Loren Zeitler, Esq., counsel for Defendant County of Westchester and Helen May (via ECF)

Granted.

So Ordered

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